

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Re: D.I. Nos. 2694, 2695, 2696, 2697, 2698,
2699, 2700, 2701, 2702, 2703, 2704 & 2705**

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS ORDER (I)
AUTHORIZING THE DEBTORS TO REJECT CERTAIN EXECUTORY CONTRACTS
AND/OR UNEXPIRED LEASES (II) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On October 9, 2024, the Court entered an *Order (I) Authorizing Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property and (II) Authorizing and Establishing Procedures to Reject Executory Contracts and Unexpired Leases* [D.I. 461] (the “**Lease Rejection Procedures Order**”).

2. Pursuant to the Lease Rejection Procedures Order, on May 7, 2025, the Debtors filed twelve rejection notices, rejecting certain executory contracts and/or unexpired leases [D.I. 2694–2705] (each a “**Rejection Notice**” and, collectively, “**Rejection Notices**”).

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

3. The deadline to object to each of the Rejection Notices was May 21, 2025, at 4:00 p.m. (ET) (the “**Objection Deadline**”).

4. Prior to the Objection Deadline, the Debtors received informal comments from Spireon, Inc. (“**Spireon**”), regarding the fiftieth Rejection Notice [D.I. 2702]. The Debtors have resolved Spireon’s comments through revisions to the form of order, which will be submitted under separate certification of counsel. Accordingly, Spireon’s contracts have been removed from the schedule of rejected contracts attached to the form of order pursuant to paragraph 4(f) of the Lease Rejection Procedures Order.

5. Attached hereto as **Exhibit A** is a proposed form of omnibus order approving the Rejection Notices and authorizing the Debtors to reject certain unexpired leases (the “**Proposed Order**”). For the convenience of the Court and all parties in interest, a redline reflecting the removal of the Spireon contracts from the fiftieth Rejection Notice [D.I. 2702] is attached as **Exhibit B** hereto.

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WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: June 10, 2025
Wilmington, Delaware

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